



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

AUG 21 2009

(AE-17J)

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Garrett Tinsman
Executive Vice President, Operations
Sauder Woodworking Company
502 Middle St.
Archbold, Ohio 43502

Re: Sauder Woodworking Company Cogeneration Facility
Archbold, Ohio
Administrative Consent Order

Dear Mr. Tinsman:

Enclosed is an executed original of the Administrative Consent Order regarding the above captioned case. If you have any questions about the Order, please contact me at 312-886-6812.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Brent Marable".

Brent Marable, Chief
Air Enforcement and Compliance Assurance Section (IL/TN)

Enclosure: Administrative Consent Order EPA-5-09-113(a)-05-OH

cc: Robert Hodanbosi, Chief
Division of Air Pollution Control
Ohio Environmental Protection Agency

Donald Waltermeyer, Air Pollution Control Supervisor
Ohio Environmental Protection Agency
Northwest District Office

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5**

IN THE MATTER OF:)	EPA-5-09-113(a)-05-OH
)	
Sauder Woodworking Company)	Proceeding Under Sections 113(a)(3),
Cogeneration Facility)	114(a)(1) of the Clean Air Act,
Archbold, Ohio)	42 U.S.C. §§ 7413(a)(3), 7414(a)(1)

Administrative Consent Order

1. The Director of the Air and Radiation Division, U.S. Environmental Protection Agency (U.S. EPA), Region 5, is issuing this Administrative Consent Order (ACO or Order) to Sauder Woodworking Company (Sauder) under Sections 113(a)(3) and 114(a)(1) of the Clean Air Act (CAA or the Act), 42 U.S.C. §§ 7413(a)(3) and 7414(a)(1).

2. Sauder, an Ohio Corporation, owns and operates two 63.75 mmBTU/hour wood/natural gas-fired boilers, Boiler #1 (B008) and Boiler #2 (B009), at its Cogeneration Facility located at 820 West Barre Road in Archbold, Ohio (facility). The boilers primarily burn wood waste. Natural gas serves as a backup and is also typically used for startup.

3. The boilers are equipped with a cyclone, selective catalytic reduction system (SCR) and electrostatic precipitator (ESP) that are used for pollution control.

4. B008 and B009 produce energy and steam to provide almost one third of the energy needs for the Sauder Woodworking Facility, which manufactures ready-to-assemble furniture and home furnishing. Some steam is sold externally to nearby companies.

Statutory and Regulatory Background

Relevant Permits

5. Permit to Install 03-05740 (PTI) issued to Sauder (Facility ID: 03-26-00-0079) by the Ohio EPA in August 1992, and later modified on October 4, 2007.

6. Final Title V permit (3745-77) Ohio EPA issued to Sauder on October 24, 2001.
7. Title V Minor Permit Modification Ohio EPA issued to Sauder on February 17, 2005.
8. Final Title V Administrative Permit Amendment Ohio EPA issued to Sauder on March 1, 2005.

New Source Performance Standards

9. Section 111 of the CAA requires U.S. EPA to implement the New Source Performance Standards (NSPS) program. The NSPS are nationally uniform emission standards for new or modified stationary sources falling within industrial categories that significantly contribute to air pollution.

10. NSPS regulates new sources pursuant to Section 111(b) of the CAA and provides guidelines to states regarding regulating these same types of existing sources pursuant to Section 111(d) of the CAA.

11. NSPS is codified in 40 C.F.R. Part 60. 40 C.F.R. Part 60 includes a standard of performance for Small Industrial-Commercial-Institutional Steam Generating Units (40 C.F.R. Part 60, Subpart Dc).

12. Sauder's Title V Permit states that B008 and B009 are subject to 40 C.F.R. Part 60, Subpart Dc, requirements.

13. 40 C.F.R. §§ 60.43c(c) and (d) states that no owner or operator of an affected facility that combusts coal, wood or oil and has a heat input capacity of 30 mmBTU/hour or greater shall cause to be discharged into the atmosphere from that affected facility any gases that exhibit greater than twenty percent (20%) opacity (6-minute average), except for one six-minute

period per hour of not more than 27 percent (27%) opacity, except during periods of startup, shutdown or malfunction.

14. 40 C.F.R. § 60.13(e) states that except for system breakdowns, repairs, calibration checks, and zero and span adjustments required under paragraph (d) of this section, all continuous monitoring systems shall be in continuous operation and shall meet minimum frequency of operation requirements.

15. 40 C.F.R. § 60.7(c) states, in part, that “Each owner or operator required to install a continuous monitoring device shall submit excess emissions and monitoring systems performance report ... and/or summary report form ... Written reports of excess emissions shall include the following information:

(1) The magnitude of excess emissions computed in accordance with §60.13(h), any conversion factor(s) used and the date and time of commencement and completion of each time period of excess emissions. The process operating time during the reporting period.

(2) Specific identification of each period of excess emissions that occurs during startups, shutdowns and malfunctions of the affected facility. The nature and cause of any malfunction (if known), the corrective action taken or preventive measures adopted.

(3) The date and time identifying each period during which the continuous monitoring system was inoperative except for zero and span checks and the nature of the system repairs or adjustments.”

SIP - General

16. Section 110 of the Act, 42 U.S.C. § 7410, in order to protect public health and welfare, requires States to adopt, and submit to U.S. EPA for approval, State Implementation Plans (SIPs) providing for the implementation, maintenance and enforcement of the National Ambient Air Quality Standards (NAAQS) promulgated by U.S. EPA pursuant to Section 109 of the Act, 42 U.S.C. § 7409. U.S. EPA has promulgated NAAQS for, among other pollutants, particulate matter and opacity.

17. To attain and maintain Primary and Secondary NAAQS, each implementation plan must include a permit program to regulate the modification and construction of any stationary source of air pollution as necessary to assure that NAAQS are achieved. The State of Ohio has incorporated such a permitting program into its SIP. Under this program, owners or operators must obtain a Permit to Install from the director of the Ohio EPA before beginning installation of a new source of air pollutants or the modification of an existing air containment source.

18. Title I of the CAA and its implementing regulations require compliance with the terms and conditions of the Ohio SIP and Permits to Install.

19. Pursuant to 40 C.F.R. § 52.23, failure to comply with any approved regulatory provision of a SIP, or with any permit condition issued pursuant to approved or promulgated regulations for the review of new or modified stationary or indirect sources, renders the person so failing to comply in violation of a requirement of an applicable implementation plan and subject to enforcement under Section 113 of the Act, 42 U.S.C. § 7413.

20. Under Section 113(a)(1) of the Act, 42 U.S.C. § 7413(a)(1), the Administrator of U.S. EPA may issue an order requiring compliance to any person who has violated or is violating

a SIP. The Administrator has delegated this authority to the Director of the Air and Radiation Division.

SIP - Emission Limits

21. U.S. EPA approved Ohio Administrative Code (OAC) Rule 3745-17-07(A)(1)(a), governing opacity, as part of the federally enforceable Ohio SIP on May 27, 1994. The rule became effective on June 27, 1994. 59 Fed. Reg. 27464 (40 C.F.R. § 52.1870(c)(97)).

22. OAC Rule 3745-17-07(A)(1), (2) and (3) state that with the exception of startup, shutdown, or malfunction, visible particulate emission limitations for stack emissions shall not exceed 20% opacity, as a six-minute average.

SIP - Permit to Install

23. Sauder's PTI, by establishing applicability to 40 C.F.R. Part 60, Subpart Dc, prohibits B008 and B009 from emitting visible emissions over 20% opacity, as a six-minute average except for one six-minute period per hour of not more than 27% opacity and during periods of startup, shutdown or malfunction.

24. Sauder's PTI states that nitrogen oxide (NO_x) emissions at B008 and B009 at the facility shall not exceed 0.20 pound (lb)/mmBTU.

25. Sauder's PTI states that volatile organic compound (VOC) emissions at B009 at the facility shall not exceed 0.15 lb/mmBTU.

26. Sauder's PTI states that the facility shall install, calibrate, maintain and operate two Continuous Emission Monitoring Systems (CEMS): one for measuring the opacity of the particulate emissions (a Continuous Opacity Monitoring System, or COMS); the other to measure the amount of NO_x emissions discharged to the atmosphere by the two boilers. The CEMS shall be in operation at all times when the boilers are being fired by wood.

27. Sauder's PTI states that pursuant to 40 C.F.R. § 60.7, the facility shall submit reports on a quarterly basis to the Ohio EPA field office documenting all instances of opacity values in excess of the limitations specified in OAC Rule 3745-17-07 or any limitations specified in the terms and conditions of the permit..

Title V Permit

28. Title V of the Act, 42 U.S.C. §§ 7661a-7661f, establishes an operating permit program for certain sources, including "major sources." Pursuant to Section 502(b) of the Act, 42 U.S.C. § 7661a(b), on July 21, 1992, U.S. EPA promulgated regulations establishing the minimum elements of a permit program to be administered by any air pollution control agency. 57 Fed. Reg. 32295. These regulations are codified at 40 C.F.R. Part 70.

29. Section 502(a) of the Act, 42 U.S.C. § 7661a(a), states that, after the effective date of any permit program approved or promulgated under Title V of the Act, no source subject to Title V may operate the source except in compliance with its Title V permit.

30. 40 C.F.R. § 70.7(b) states that, no source subject to Title V may operate the source except in compliance with a Title V permit.

31. U.S. EPA fully approved the Ohio Title V program, effective October 1, 1995. 60 Fed. Reg. 42045 (August 15, 1995) (40 C.F.R. Part 70, Appendix A). Ohio's Title V permit requirements are codified at OAC Rule 3745-77.

32. Part III.A.I.1. of Sauder's Title V Permit (Page 12 of 27), by establishing applicability to 40 C.F.R. Part 60, Subpart Dc, prohibits B008 from emitting visible emissions over 20% opacity, as a six-minute average, except for one six-minute period per hour of not more than 27% opacity, and except during periods of startup, shutdown and malfunction.

33. Part III.A.I.1. of Sauder's Title V Permit (Page 20 of 27), by establishing applicability to 40 C.F.R. Part 60, Subpart Dc, prohibits B009 from emitting visible emissions over 20% opacity, as a six-minute average, except for one six-minute period per hour of not more than 27% opacity, and except during periods of startup, shutdown and malfunction.

34. Part III.A.I.1. of Sauder's Title V Permit (Page 12 of 27) incorporates Sauder's PTI NO_x limit, prohibiting B008 is from emitting greater than 0.20 lb NO_x/mmBTU of actual heat input.

35. Part III.A.I.1. of Sauder's Title V Permit (Page 20 of 27) incorporates Sauder's PTI NO_x limit, prohibiting B009 from emitting greater than 0.20 lb NO_x/mmBTU of actual heat input.

36. Part III.A.I.1. of Sauder's Title V Permit (Page 20 of 27) incorporates Sauder's PTI VOC limit, prohibiting B009 from emitting greater than 0.15 lb VOC/mmBTU of actual heat input.

37. Sauder's Title V Permit states that B008 and B009 are subject to 40 C.F.R. Part 60, Subpart Dc, requirements. 40 C.F.R. § 60.13(e) contains the requirement that all continuous monitoring systems shall be in continuous operation.

38. Sauder's Title V Permit states that B008 and B009 are subject to 40 C.F.R. Part 60, Subpart Dc, requirements. 40 C.F.R. § 60.7(c) contains the requirements for excess emissions and monitoring systems performance reports.

Findings

39. Sauder owns or operates an "emission source" within the meaning of Section 114(a)(1) of the Act, 42 U.S.C. § 7414(a)(1). Therefore, Sauder is subject to the requirements of Section 114(a)(1).

40. On April 18, 2008, the Director of the Air and Radiation Division, U.S. EPA, Region 5, issued a Notice of Violation (NOV) and Finding of Violation (FOV) to Sauder alleging violations of the Ohio SIP, NSPS General Provisions (40 C.F.R. Part 60, Subpart A), NSPS for Small Industrial-Commercial-Institutional Steam Generating Units (40 C.F.R. Part 60, Subpart Dc), Sauder's Title V permit and Sauder's PTI.

41. In the NOV/FOV, Sauder was cited for failing to be in continuous compliance with the 20% opacity limit for B008 and B009 during calendar years 2003 through 2005. This is a violation of 40 C.F.R. Part 60 (Subpart Dc), the Ohio SIP, Sauder's Title V permit and Sauder's PTI. These are also violations of Sections 111 and 502 of the CAA. Sauder has provided documentation asserting that the total duration of excess opacity emissions was 0.017% of source operating time.

42. In the NOV/FOV, Sauder was cited for failing to be in continuous compliance with the applicable NO_x limit for B008 and B009 during calendar years 2003 through 2005. This is a violation of the NO_x limit established in Sauder's PTI and included in its Title V permit. This is also a violation of Section 502 of the CAA. Sauder has provided documentation asserting that the duration of excess NO_x emissions for boiler B008 was 0.55% of source operating time during the NOV time period and that the duration of excess NO_x emissions for boiler B009 was 0.25% of source operating time during the NOV time period.

43. In the NOV/FOV, Sauder was cited for failing to continuously operate COMS and CEMS for NO_x for B008 and B009 during calendar years 2003 through 2005. This is a violation of 40 C.F.R. § 60.13(e), Sauder's Title V permit and Sauder's PTI. These are also violations of Sections 111 and 502 of the CAA. Sauder has provided documentation which asserts that COMS and CEMS were operated continuously except for periods of calibration and system

malfunction. Sauder asserts that, excluding calibrations, the total downtime of the COMS was 0.48% of source operating time for the entire NOV time period. Sauder asserts that, excluding calibrations, the total downtime of the CEMS was 0.26% for boiler B008 and 0.32% for boiler B009 during the entire NOV time period.

44. In the NOV/FOV, Sauder was cited for omitting certain required information, such as root cause and/or corrective action, in various quarterly excess emission reports (EERs) during calendar years 2003 through 2005 for B008 and B009 excess emissions and COMS and CEMS for NO_x. This is a violation of 40 C.F.R. § 60.7(c), Sauder's Title V permit and Sauder's PTI. These are also violations of Sections 111 and 502 of the CAA.

45. On February 26, 2009, the Director of the Air and Radiation Division, U.S. EPA, Region 5, issued a FOV alleging violations of Sauder's Title V permit and Sauder's PTI.

46. In the FOV, Sauder was cited for failing to comply with the applicable VOC limit for B009 during a stack test performed on June 17, 2008. This is a violation of the VOC limit established in Sauder's PTI and included in its Title V permit. This is also a violation of Section 502 of the CAA.

47. The violations were discovered through a U.S. EPA review of EERs submitted by Sauder to the State of Ohio as required by 40 C.F.R. Part 60, Subparts A and Dc, and also as required by Sauder's permits, in addition to the review of stack tests.

48. On May 15, 2008, Sauder representatives and U.S. EPA met to discuss the NOV/FOV issued to the facility on April 18, 2008. During this meeting, Sauder identified what they concluded to be the root causes of the cited exceedances. For example, Sauder claimed that opacity exceedances are a result of cleaning activities at the SCR and economizer. Sauder verbally proposed a compliance program that the facility was going to adopt.

49. On June 12, 2008, U.S. EPA issued to Sauder an information request in accordance with Section 114 of the CAA (Information Request). The Information Request asked that Sauder perform stack and relative accuracy test audit (RATA) tests at B008 and B009 during the following activities:

- a. System cleaning/soot blowing at which time operators are using pressurized air to clean the SCR equipment, and
- b. System cleaning/soot blowing at which time operators are using pressurized steam to clean the economizer.

50. On July 18, 2008, U.S. EPA received CEMS RATA test results conducted on B008 (June 18, 2008) and B009 (June 17, 2008).

51. On July 24, 2008, U.S. EPA received stack test results that were performed on B008 (June 18, 2008) and B009 (June 17, 2008). Sampling was performed to determine the mass emission rate of total filterable particulate matter (PM), NO_x, carbon monoxide (CO) and total gaseous nonmethane organics. Visible emissions measured as percent opacity were also determined.

52. On August 14, 2008, U.S. EPA received a copy of a letter sent by Ohio EPA to Sauder informing them that they are aware Sauder exceeded their VOC limit at B009 during the June 17, 2008 stack test. Sauder was aware of the problem and was working on identifying the cause of the excess VOC emissions. Ohio EPA asked Sauder to submit a compliance plan within 45 days of the date of the letter.

53. In a letter dated September 12, 2008, Sauder submitted a VOC compliance plan to Ohio EPA.

54. On October 31, 2008, U.S. EPA received a copy of a letter from Sauder to Ohio EPA informing them they retested VOC emissions (total gaseous nonmethane organics) at B009 on October 9, 2008. The test indicated a passing result.

55. U.S. EPA requested excess emission data to review from Sauder for the 3rd and 4th quarters of 2008. These two quarters follow the period in which Sauder was to begin implementation of the compliance program verbally described to U.S. EPA during the May 15, 2008 meeting. U.S. EPA received and reviewed these EERs.

56. In a letter dated January 23, 2009 that Sauder sent to U.S. EPA, they outlined the actions the facility has taken to come into compliance with NO_x and opacity emission limits.

57. In a letter dated March 16, 2009 that Sauder sent to U.S. EPA, the company summarized achievements with respect to resolving the issues contained in the NOV/FOV issued to the facility on April 18, 2008, in particular, the letter addressed VOC, NO_x and opacity emissions as well as reporting/ documentation.

58. On March 23, 2009, representatives of Sauder and U.S. EPA met to discuss the FOV issued to the facility on February 26, 2009.

59. In a letter to U.S. EPA dated March 26, 2009 Sauder responded to four follow-up questions U.S. EPA posed during the conference held on March 23, 2009. Included in the response was a summary of previous VOC stack test results, a summary of the resources Sauder committed to bring the facility into compliance, the recent employment history at the plant and a summary of recent financial performance.

60. In an e-mail sent by Sauder's counsel on April 7, 2009, U.S. EPA was provided recent facility net worth information.

Compliance Program

61. This compliance program outlined below pertains to both boilers B008 and B009 and to the pollution control equipment associated with both boilers.

62. By the effective date of this Order, Sauder shall at all times have trained maintenance personnel who work on site at the cogeneration facility or are on call whenever the cogeneration plant is operating.

63. For the duration of this Order, Sauder shall continue to utilize the boiler reconfiguration that utilizes flue gas return in order to improve the efficiency of the fire and reduce emissions.

Opacity

64. By the effective date of this Order, Sauder shall at all times have critical spare parts (as listed in Appendix A) on site at the Sauder facility to allow for a quick replacement response time should one fail.

65. By the effective date of this Order, Sauder shall establish an opacity set point to ten percent (10%). If an alarm goes off, Sauder shall take appropriate action to address any opacity level issues so as to not exceed the 20% limit.

66. By the effective date of this Order, Sauder shall utilize air rakes, or another effective method, to clean (blow) the SCR and economizer so that opacity remains below the limit.

- a. The SCR shall be cleaned at minimum every 3-4 hours.
- b. The economizer shall be cleaned at minimum once a day.
- c. For an opacity exceedance, a log shall be kept of the date, start and stop time, magnitudes of exceedance, type of cleaning (SCR or economizer) and operator

performing the cleaning for SCR and economizer cleaning, opacity readings and cleaning method utilized during a cleaning event as well as documentation of the operator performing the cleaning.

67. Within six months of the effective date of this Order, Sauder shall complete an investigation of “fire-eye trips” that occur during boiler cleaning and cause opacity exceedances. Sauder shall determine an appropriate corrective action so that they remain below their opacity limit.

68. By the effective date of this Order, when boiler shutdown is to occur, the standard procedure will be to shutdown the ESP as one of the last steps and to startup the ESP as one of the first steps during the boiler startup process.

69. By the effective date of this Order, Sauder shall utilize an optimum ESP rapping cycle to maintain effective PM collector wall dislodging.

70. By the effective date of this Order, Sauder shall read ESP operating parameters three times per day to assure that all fields are operating properly. A log shall be kept of the readings and the personnel who performed the readings.

71. Sauder shall conduct semi-annual inspections of the ESP during the spring and fall boiler outage periods. Any required maintenance or preventive maintenance on the control device shall be completed prior to boiler startup. These activities are listed in Appendix B and include checking for boiler system air leaks and maintaining cleanliness of the ESP banks. A log shall be kept of the activities completed and the personnel who performed the inspections and maintenance.

72. At all times Sauder shall maintain continuous compliance with:

a. Sauder's PTI, which establishes applicability to 40 C.F.R. Part 60, Subpart Dc, and prohibits B008 and B009 from emitting visible emissions over 20% opacity, as a six-minute average, except for one six-minute period per hour of not more than 27% opacity, and except during periods of startup, shutdown and malfunction.

b. OAC Rule 3745-17-07(A), which prohibits visible emissions over 20%, as a six-minute average, except during periods of startup, shutdown and malfunction.

c. Part III.A.I.1. of Sauder's Title V Permit (Page 12 of 27), which prohibits B008 from emitting visible emissions over 20% opacity, as a six-minute average, except for one six-minute period per hour of not more than 27% opacity, and except during periods of startup, shutdown and malfunction.

d. Part III.A.I.1. of Sauder's Title V Permit (Page 20 of 27), which prohibits B009 from emitting visible emissions over 20% opacity, as a six-minute average, except for one six-minute period per hour of not more than 27% opacity, and except during periods of startup, shutdown and malfunction.

NO_x

73. By the effective date of this Order, Sauder shall at all times have two spare ammonia tank heaters on site at the Sauder facility to allow for a quick replacement response time should one fail.

74. By the effective date of this Order, Sauder shall lower their NO_x set point to 0.17 lb/mmBTU. If an alarm goes off, Sauder shall take appropriate action to address any issues so as to not exceed the 0.20 lb NO_x/mmBTU of actual heat input limit.

75. Sauder shall replace an ammonia tank heater once it has been in operation for 12 months, or as otherwise recommended by the manufacturer. A log shall be kept of ammonia tank heater replacement.

76. Sauder shall replace their SCR catalyst beds as appropriate in order to maintain compliance with applicable limits. A log shall be kept of SCR catalyst bed replacement.

77. By the effective date of this Order, Sauder shall perform daily visual inspections on components listed in Appendix B in order to maintain burn efficiency. A log shall be kept of the inspections performed and the personnel who performed the inspections.

78. By the effective date of this Order, Sauder shall perform quarterly visual inspections and preventive maintenance on components listed in Appendix B in order to maintain burn efficiency. A log shall be kept of the inspections performed and the preventive maintenance completed and the personnel who performed the inspections and maintenance.

79. Sauder shall conduct semi-annual inspections of the SCR during the spring and fall boiler outage periods. Any required cleaning maintenance or preventive maintenance on the control device shall be completed prior to boiler startup. A log shall be kept of the activities completed and the personnel who performed the inspections and maintenance.

80. At all times Sauder shall maintain continuous compliance with:

a. Sauder's PTI, which states that units B008 and B009 at the facility shall not exceed 0.20 lb NO_x/mmBTU of actual heat input.

b. Part III.A.I.1. of Sauder's Title V Permit (Page 12 of 27), which incorporates Sauder's PTI NO_x limit, prohibiting B008 from emitting greater than 0.20 lb NO_x/mmBTU of actual heat input.

c. Part III.A.I.1. of Sauder's Title V Permit (Page 20 of 27), which incorporates Sauder's PTI NO_x limit, prohibiting B009 from emitting greater than 0.20 lb NO_x/mmBTU of actual heat input.

VOC

81. By the effective date of this Order, Sauder shall at all times have the critical spare parts listed in Appendix A on site at the Sauder facility to allow for a quick replacement response time should one fail.

82. By the effective date of this Order, Sauder shall perform daily visual inspections on the boiler/burner components listed in Appendix B. A log shall be kept of the inspections performed and the personnel who performed the inspections.

83. By the effective date of this Order, Sauder shall perform quarterly visual inspections and preventive maintenance on the boiler/burner components listed in Appendix B. Additionally, Sauder shall open the burner inspection plate and to inspect and lubricate all linkages. A log shall be kept of the inspections performed and the preventive maintenance completed and the personnel who performed the inspections and maintenance.

84. Sauder shall conduct semi-annual inspections of components listed in Appendix B during the spring and fall boiler outage periods. Any required maintenance or preventive maintenance shall be completed prior to boiler startup. A log shall be kept of the activities completed and the personnel who performed the inspections and maintenance.

85. At all times Sauder shall maintain continuous compliance with:

a. Sauder's PTI, which states that VOC emissions at B009 at the facility shall not exceed 0.15 lb/mmBTU.

b. Part III.A.I.1. of Sauder's Title V Permit (Page 20 of 27) incorporates Sauder's PTI VOC limit, prohibiting B009 from emitting greater than 0.15 lb VOC/mmBTU of actual heat input.

COMS/CEMS

86. Sauder shall follow their written quality assurance/quality control plans for the COMS and CEMS at the facility to ensure continuous valid and representative emission readings, including:

- a. Auditing their COMS on a quarterly basis in accordance with Title V permit requirements, specifically as found in section 'VI. Miscellaneous Requirements.'
- b. Auditing both their CEMS on a quarterly basis in accordance with 40 C.F.R. Part 60, Appendix F.

87. Sauder shall replace their COMS and both CEMS as necessary to ensure continuous valid and representative emission readings.

88. At all times Sauder shall maintain continuous compliance with:

- a. Sauder's Title V Permit, which states that units B008 and B009 are subject to 40 C.F.R. Part 60, Subpart Dc, requirements.
- b. 40 C.F.R. § 60.13(e), which states that except for system breakdowns, repairs, calibration checks, and zero and span adjustments required under paragraph (d) of this section, all continuous monitoring systems shall be in continuous operation and shall meet minimum frequency of operation requirements.

Reporting Requirements

89. By the effective date of this Order, Sauder shall prepare EERs complete with all the information required by the NSPS General Provisions (40 C.F.R. Part 60, Subpart A) and the

NSPS for Small Industrial-Commercial-Institutional Steam Generating Units (40 C.F.R. Part 60, Subpart Dc). For this purpose, Sauder developed reporting templates that are acceptable to U.S. EPA, which are attached in Appendix C.

90. Sauder shall submit quarterly EERs, as required by 40 C.F.R. Part 60, Subparts A and Dc, to U.S. EPA within one month of the end of a quarter. Included in this submission, Sauder will also report all violations of this Order that occurred during that quarter.

91. At all times Sauder shall maintain continuous compliance with:

a. Sauder's Title V Permit, which states that units B008 and B009 are subject to 40 C.F.R. Part 60, Subpart Dc, requirements.

b. 40 C.F.R. § 60.7(c), which states, in part, that "Each owner or operator required to install a continuous monitoring device shall submit excess emissions and monitoring systems performance report ... and/or summary report form ... Written reports of excess emissions shall include the following information:

(1) The magnitude of excess emissions computed in accordance with §60.13(h), any conversion factor(s) used and the date and time of commencement and completion of each time period of excess emissions. The process operating time during the reporting period.

(2) Specific identification of each period of excess emissions that occurs during startups, shutdowns and malfunctions of the affected facility. The nature and cause of any malfunction (if known), the corrective action taken or preventative measures adopted.

(3) The date and time identifying each period during which the continuous monitoring system was inoperative except for zero and span checks and the nature of the system repairs or adjustments.”

92. Sauder must submit all materials required by this Order to:

Attn: Compliance Tracker (AE-17J)
Air Enforcement and Compliance Assurance Branch
Air and Radiation Division
U.S. Environmental Protection Agency, Region 5
77 West Jackson Blvd.
Chicago, Illinois 60604-3511

Padmavati Bending, (C-14J)
Office of Regional Counsel
U.S. Environmental Protection Agency, Region 5
77 West Jackson Blvd.
Chicago, Illinois 60604-3511

93. Sauder shall keep records of all reports submitted to U.S. EPA and all documents supporting those reports for at least one year after the termination of this Order.

94. Sauder shall maintain required maintenance records/logs for at least five years after the termination of this Order. These maintenance records/logs shall be available to U.S. EPA upon request.

General Provisions

95. This Order does not affect Sauder’s responsibility to comply with other federal, state and local laws.

96. This Order does not restrict U.S. EPA’s authority to enforce Section 114 of the Act, or any other section of the Act.

97. Failure to comply with this Order may subject Sauder to penalties of up to \$37,500 per day for each violation under Section 113 of the Act, 42 U.S.C. § 7413 and 40 C.F.R. Part 19.

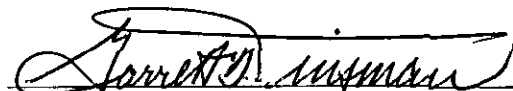
98. The terms of this Order are binding on Sauder, its assignees and successors. Sauder must give notice of this Order to any successors in interest prior to transferring ownership and must simultaneously verify to U.S. EPA, at the above address, that it has given the notice.

99. This Order is not subject to the Paperwork Reduction Act, 44 U.S.C. §§ 3501 et seq., because it seeks collection of information by an agency from specific individuals or entities as part of an administrative action or investigation. U.S. EPA may use any information submitted under this Order in an administrative, civil judicial or criminal action.

100. Sauder agrees to the terms of this Order.

101. This Order is effective on the date of signature by the Director of the Air and Radiation Division. This Order will terminate one year from its effective date provided that Sauder has complied with all terms of the Order throughout its duration.

8/7/09
Date


Garrett Tinsman, Executive Vice President, Operations
Sauder Woodworking Company

8/21/09
Date


Cheryl L. Newton, Director
Air and Radiation Division

Appendix A

Critical Spare Parts

Parts List for Boilers #1 & #2

Inventory Item	Sauder Catalog Name
607956	BELT, V - 71"OUTSIDE L, 3/8"WD, SUPER HC NOTCHED V-BELT
608009	BELT, V - 69"OUTSIDE L, 1/2"WD, V-BELT
608042	BELT, V - 41"OUTSIDE L, 21/32"WD, MOLDED NOTCH V-BELT
608066	BELT, V - 67"OUTSIDE L, 21/32"WD, MOLDED NOTCH V-BELT
641469	SEAL KIT, CYLINDER - CYLINDER REPAIR KIT FOR M/930... AND CM/930..., SERIES
642848	VALVE, SOLENOID - 1/4"NPT, 120VAC, 3 WAY, BRASS, DIRECT ACTING, GENERAL SERVICE, SOLENOID VALVE
642854	VALVE, SOLENOID - 1/4"NPT, 120VAC, 3 WAY, BRASS, DIRECT ACTING, GENERAL SERVICE SOLENOID VALVE
643563	SEAL, PACKING - 1/4"SQ, KEVLAR AND TEFLON BRAIDED PACKING (1LB=20 TO 24'APP.)
643863	O-RING - 13/16"ID, 1 1/16"OD, 1/8"WD, VITON, O-RING
644933	SWITCH, ACTUATOR - .75"DIA, .25"WD, 1.5"RADIUS, STEEL, BACK ROLLER MOUNTED LEVER, FOR ROTARY ACTUATED SWITCH
646586	FILTER, AIR - 20"WD, 20"L, 1"TH, PLEATED, AIR FILTER
646965	BELT, V - 48"OUTSIDE L, 1/2"WD, V-BELT
647822	MOTOR, AC - 208-230/460VAC, 3HP, 3450RPM, 60HZ, 145T FRAME, 3PH, TEFC, RIGID BASE, 1.15 SERVICE FACTOR, AC MOTOR
648892	RESISTOR - 5W, 1KOHM, CERAMIC RESISTOR
651872	FILTER, AIR - 20"WD, 25"L, 2"TH, PLEATED, AIR FILTER
656353	RESISTOR - 250OHM, 5W, RESISTOR ASSEMBLY
658077	TERMINAL, CONTROL - CONFIGURATION AND TUNING TERMINAL
658435	SWITCH - DRAFT NON-TIME DELAY SWITCH
658438	PLUG, SPARK - SI-140, SPARK PLUG
658998	FILTER, AIR - 24"WD, 1"TH, POLYESTER MEDIA
659124	IGNITOR, PILOT - 51"NOMINAL PILOT L, STAINLESS STEEL HEAD, PILOT/IGNITOR ASSEMBLY
659126	PLUG, SPARK - SPARK PLUG ASSEMBLY
659127	ELECTRODE - ELECTRODE ASSEMBLY
668332	FILTER, AIR - 3/4", VACUUM FILTER
668393	FILTER, AIR - 1 1/2"OD, 3 1/2"OAL, PAPER, AIR FILTER ELEMENT
669590	FILTER - 1 1/2"DIA, 6"L, GAS SAMPLE PROBE, FILTER ELEMENT
670989	FILTER - OXYGEN FILTER
677134	KIT, REBUILD - REBUILD KIT FOR MODEL 607CA32 AIR PUMP
683255	CELL - OXYGEN MEASURING CELL FOR MODEL 1420B, OXYGEN ANALYZER
683274	SENSOR - OXYGEN SENSOR
684277	CONNECTOR - SUCTION CONNECTION PIECE
685579	MOTOR, DC - 500/300VDC, 7.5HP, 1750/2300RPM, FRAME SC2113ATZ, DC MOTOR
697018	NOZZLE - ASPIRATOR NOZZLE
697018	NOZZLE - ASPIRATOR NOZZLE
697019	GASKET - BLOCK GASKET
697019	GASKET - BLOCK GASKET
697022	GASKET - FLANGE MOUNTING GASKET
697024	THERMOCOUPLE - THERMOCOUPLE ASSEMBLY
697025	O-RING - O-RING SEAL
697028	GASKET - SENSOR GASKET, R9000
697046	GASKET - ASPIRATOR GASKET
697046	GASKET - ASPIRATOR GASKET
697050	GASKET - ISOLATOR GASKET
697954	DISK - FLOW DISK
697955	GASKET - SEAL PLATE GASKET
697956	VENTURI - ASPIRATOR VENTURI

710548	CONTROLLER, CIRCUIT - OPTIPULSE CIRCUIT CONTROLLER
713149	BOARD, PROCESSOR - OPTIPULSE CIRCUIT CONTROLLER MAIN PROCESSOR BOARD
721639	CARD, DRIVER - BASE DRIVER CARD
721647	ORIFICE - .013, ORIFICE FOR 258517C1
721647	ORIFICE - .013, ORIFICE FOR 258517C1
737342	KIT, REPAIR - REPAIR KIT FOR A741-352S1 PUMP HEAD 36119
746829	COVER, MANIFOLD - MANIFOLD COVER
747643	PLUG, PIPE - 1/16, TEFLON-COATED, PIPE PLUG FOR OXYGEN SENSOR
747644	HEATER - HEATER CARTRIDGE
747645	ORIFICE - .018, ORIFICE
747646	PLUG, PIPE - 1/8, TEFLON-COATED, PIPE PLUG FOR OXYGEN SENSOR
747647	PLUG, PIPE - 1/4, TEFLON-COATED, PIPE PLUG FOR OXYGEN SENSOR
747648	O-RING - O-RING SEAL
747649	ORIFICE - .010, ORIFICE
747650	HEATER - HEATER CARTRIDGE
747652	GASKET - FLOW DISK GASKET
747653	GASKET - FLOW DISK GASKET
747654	O-RING - O-RING SEAL
747656	FILTER - FILTER
747658	SPRING - SPRING
753049	ACTUATOR, VANE - VANE ACTUATOR FOR UP10A0000 DRIVE
601861	SHEAR (ROLL) PINS FOR JACKSHAFT

Critical Spare Parts for Boilers #1 & #2 ESP

Inventory Item	Sauder Catalog Name
607956	BELT, V - 71"OUTSIDE L, 3/8"WD, SUPER HC NOTCHED V-BELT
607977	BELT, V - 34"OUTSIDE L, 1/2"WD, V-BELT
619923	ELEMENT, HEATING - 9.5MMX150MM, HEATER CARTRIDGE
641199	BLOCK, TERMINAL - 22-12AWG, GROUND TERMINAL BLOCK
641200	BLOCK, TERMINAL - 600V, 30AMP, 22-10AWG, GREY COMPRESSION CLAMP TERMINAL BLOCK
641239	BAR, JUMPER - 10 POLES, ASSEMBLED JUMPER BAR FOR M 4/6
647820	MOTOR, AC - 208-230/460VAC, .75HP, 1725RPM, 60HZ, 56C FRAME, 3PH, C-FACE LESS BASE, 1.25 SERVICE FACTOR, GENERAL PURPOSE, AC MOTOR
651872	FILTER, AIR - 20"WD, 25"L, 2"TH, PLEATED, AIR FILTER
658998	FILTER, AIR - 24"WD, 1"TH, POLYESTER MEDIA
668682	ELEMENT, HEATING - 12.5MM DIA, 80MM L, 440VAC, 200W, 3 WIRE, HEATER CARTRIDGE, WITH 350MM L, STAINLESS STEEL, OVERBRAID
668949	BELT, TIMING - 40.5"L, 1"WD, NEOPRENE TIMING BELT
670634	CARD - CPU POWER SUPPLY CARD
670636	ROD, INSULATOR - 40"L, INSULATOR ROD
674787	HEATER - 125W, 120VAC, CRANK CASE HEATER
676672	TUBING, SHRINKABLE - .093"OD, 4"L, BLACK, THIN WALL HEAT SHRINKABLE TUBING, MADE USING SAUDER PART 606180
702828	SWITCH - TYPE B, SPEED SWITCH
710529	ASSEMBLY, PROBE - REMOTE, CERAMIC, HIGH TEMPERATURE, RF LEVEL PROBE ASSEMBLY WITH 12"L LAGGING, RFL-A-12 AND 450 DEGREE F CABLE
710548	CONTROLLER, CIRCUIT - OPTIPULSE CIRCUIT CONTROLLER
713149	BOARD, PROCESSOR - OPTIPULSE CIRCUIT CONTROLLER MAIN PROCESSOR BOARD
716293	FILTER, AIR - 14 3/4"L OVERALL, 5 3/4"WD OVERALL, 1/2"TH, 4 1/4"X14"L INNER WIRE FRAME SUPPORT 14"X4 1/4", POLYESTER, AIR FILTER ELEMENT FOR SYNQUEST STATION

Spare Parts for Boilers #1 & #2 Wood Screw

Inventory Item	Sauder Catalog Name
608066	BELT, V - 67"OUTSIDE L, 21/32"WD, MOLDED NOTCH V-BELT
608423	HUB, BUSHING - 1 7/8"ID, BUSHING #2517 TAPER-LOCK HUB BUSHING
644933	SWITCH, ACTUATOR - .75"DIA, .25"WD, 1.5"RADIUS, STEEL, BACK ROLLER MOUNTED LEVER, FOR ROTARY ACTUATED SWITCH
660551	CARD - 460VAC, 3-40HP, PILOT RELAY PC CARD FOR T21S0302EYT
669587	FILTER, AIR - #30 PURGE AIR FILTER
673541	CHAIN, ROLLER - 100 CHAIN SIZE, 1.25"PITCH, RIVETED ROLLER CHAIN
678525	CONTROLLER, DRIVE - 460VAC INPUT, 500VDC OUTPUT, 300VDC FIELD, 18AMPS, 10HP, MINPAK PLUS DRIVE CONTROL
685579	MOTOR, DC - 500/300VDC, 7.5HP, 1750/2300RPM, FRAME SC2113ATZ, DC MOTOR
685597	BRUSH, MOTOR - 20MM WD, 10MM TH, 32MM L, CARBON BRUSH
708771	WHEEL, FAN - 26"DIA, CW ROTATION, NORTH BOILER, WOOD CONVEYING, FAN WHEEL, REFERENCE SAUDER DRAWINGS #116058, #116067, #116068 AND #116070
708771	WHEEL, FAN - 26"DIA, CW ROTATION, NORTH BOILER, WOOD CONVEYING, FAN WHEEL, REFERENCE SAUDER DRAWINGS #116058, #116067, #116068 AND #116070
713041	RELAY, CONTROL - 120VAC COIL, 4 CONTACT, 2NO/2NC, RELAY CONTROL
714986	LINERS, FAN - 4 PIECE SET, FAN LINER PLATES FOR USE WITH P-3006 WHEEL AT CO-GEN, PER SAUDER PRINT
714986	LINERS, FAN - 4 PIECE SET, FAN LINER PLATES FOR USE WITH P-3006 WHEEL AT CO-GEN, PER SAUDER PRINT

Spare Parts for Ammonia Tank

Inventory Item	Sauder Catalog Name
707277	ELEMENT - 480-15KW, AMMONIA HEATER, VAPORIZING ELEMENT
753857	SWITCH - 15AMP, 1/2HP/125VAC, 7/4HP/250VAC, NC/NO/COMMON, ADJUSTABLE DIAL SWITCH

Spare Parts for Boilers #1 & #2 SCR

Inventory Item	Sauder Catalog Name
658998	FILTER, AIR - 24"WD, 1"TH, POLYESTER MEDIA
669583	FILTER - FILTER ELEMENT
669590	FILTER - 1 1/2"DIA, 6"L, GAS SAMPLE PROBE, FILTER ELEMENT
676582	SUPPLY, POWER - RTAS, POWER BOX WITH THERMOSAT
683382	RING, RETAINING - 2.165"HOUSING DIA, .078"TH, INTERNAL RETAINING RING
690890	WINDOW, FILTER - 665 MICRON, FILTER
694569	O-RING - HEATED BLOCK O-RING SEAL
694570	O-RING - FILTER CAP BOLT O-RING SEAL
743382	WHEEL - 82MM OD, 32MM WD, STEEL V-GROOVED WHEEL FOR UNDERCARRIAGE, PER SAUDER PRINT

Spare Parts for Boilers #1 & #2 NQ/O, Systems

Inventory Item	Sauder Catalog Name
668393	FILTER, AIR - 1 1/2"OD, 3 1/2"OAL, PAPER, AIR FILTER ELEMENT
669583	FILTER - FILTER ELEMENT
669590	FILTER - 1 1/2"DIA, 6"L, GAS SAMPLE PROBE, FILTER ELEMENT
677134	KIT, REBUILD - REBUILD KIT FOR MODEL 607CA32 AIR PUMP
689085	FILTER - FILTER ELEMENT FOR 33G HOUSING

693147	CARD, CONTROL - NOX OPERATION CONTROLLER CARD WITH 4-20 MILLIAMP CURRENT , OUTPUT AND SENSOR FOR 1491
694569	O-RING - HEATED BLOCK O-RING SEAL
694570	O-RING - FILTER CAP BOLT O-RING SEAL
694571	THERMOSTAT - CONTROL THERMOSTAT
702155	ORIFICE - .004"(4 MIL), BLUE, ORIFICE FOR MODEL 200EH NOX ANALYZER
702156	ORIFICE - .007"(7 MIL), ORANGE, ORIFICE FOR MODEL 200EH NOX ANALYZER
702157	O-RING, ORIFICE - ORIFICE O-RING FOR MODEL 200EH NOX ANALYZER
702158	FILTER - SINTERED FILTER FOR MODEL 200EH NOX ANALYZER
723382	KIT, REPAIR - DIAPHRAGM, VALVE GASKET, TWO VALVE DISCS, ONE TEFLON WASHER, REPAIR KIT FOR PUMP 0131 OTC
723382	KIT, REPAIR - DIAPHRAGM, VALVE GASKET, TWO VALVE DISCS, ONE TEFLON WASHER, REPAIR KIT FOR PUMP 0131 OTC
727649	PUMP, AIR - AIR PUMP
727649	PUMP, AIR - AIR PUMP
749549	FILTER, ANALYZER - 1 MICRON, 47MM, TFE FILTER FOR MODEL 200EH NOX ANALYZER FOR 016300800 SAMPLE INLET PARTICULATE FILTER
749550	FILTER, ANALYZER - DFU PARTICLE FILTER FOR MODEL 200EH NOX ANALYZER FOR 011310000 OZONE DRYER
749557	ASSEMBLY, ANALYZER - DISPOSABLE, INLINE EXHAUST SCRUBBER ASSEMBLY FOR MODEL 200EH NOX ANALYZER EXTERNAL SAMPLE PUMP PROTECTION
752291	ORIFICE - .003"(3 MIL), GREEN, ORIFICE FOR MODEL 200EH NOX ANALYZER

Spare Parts for Stack

Inventory Item	Sauder Catalog Name
622804	FILTER, AIR - .656"TOP ID, 2.621"BOTTOM ID, 5.254"OD, 11.25"H, AIR FILTER
648878	RESISTOR - 220OHM, .25W, 250V, 2 PERCENT TOLERANCE, FILM RESISTOR
669587	FILTER, AIR - #30 PURGE AIR FILTER
681805	FILTER, AIR - 20"WD, 1"TH, FILTER MEDIA, ROLL
694571	THERMOSTAT - CONTROL THERMOSTAT

Note: These are the spare parts inventoried by Sauder for the cogeneration equipment that has a potential impact on emissions.

Appendix B

Maintenance and Inspection

Daily Inspections:

- 1) Inspect all external burner linkages, positioners and diaphragms (typically hourly).
- 2) Ensure flue gas return valve is in the "return" position (typically hourly).
- 3) Inspect all external parts and verify monitor readings of COMS and CEMS equipment (typically hourly).
- 4) Take precipitator readings (minimum 3 times per day).
- 5) Inspect NH₃ tank (typically hourly).
- 6) Calibration check on COMS and CEMS.
- 7) Visually inspect stack emissions to detect excess opacity.

Weekly Preventive Maintenance:

- 1) **NH₃ Tank**
 - a) Complete ammonia tank inspection form.

Quarterly Preventive Maintenance:

- 1) **Burner**
 - a) Open all burner inspection plates and blow out.
 - b) Lubricate all linkages.
 - c) Inspect control diaphragm.
 - d) Inspect dampers.
 - e) Place controller in manual mode and cycle components for free movement.
- 2) **Sootblowers (9 per Boiler Unit)**
 - a) Inspect alignment of sootblower.
 - b) Inspect sootblowers for any defects (blown nozzles).
 - c) Cycle sootblowers for freedom of movement.
- 3) **Mechanical (Cyclone) Ash Separator**
 - a) Open and clean all flues and veins.
 - b) Inspect all parts.
 - c) Identify and seal any air leaks.
- 4) **COMS & CEMS**
 - a) Clean sample lines.
 - b) Clean and inspect monitors.
 - c) Re-build sample pumps.
 - d) Change filters.
 - e) Audit using EPA certified gases.
 - f) Inspect ammonia transfer pump.

5) Boiler

- a) Open access to fire side of boiler.
- b) Clean all sections of fire side.
- c) Inspect casing of boiler for air leaks, repair as necessary.
- d) Open access to economizer.
- e) Clean economizer.
- f) Inspect duct work for air leaks, repair as necessary.

Semi-Annual Preventive Maintenance (including all quarterly preventive maintenance plus the following):

1) Precipitator

- a) Open, clean and inspect: penthouse, precipitator (plates and electrodes) and hopper bottom.
 - Inspect for excessive build-up.
 - Inspect for air leaks.
 - Inspect insulators for dirt, cracking and/or arcing.

2) SCR Unit

- a) Open, clean and inspect catalyst condition.
- b) Inspect air rakes and replace as necessary.

Annual Preventive Maintenance (including all quarterly and semi-annual preventive maintenance plus the following):

1) Wood Bin

- a) Blow out DC drive motor.
- b) Blow out DC drive cabinet, inspect all connections.
- c) Check oil level in gear box.
- d) Inspect chains and sprockets.
- e) Replace motor brushes.
- f) Replace blower filter.

Proactive measure to mitigate risk of sudden shut-downs.

2) Wood Conveyor Fan

- a) Inspect motor auxiliary contactors.
- b) Inspect motor wire connections.
- c) Inspect fan liner.
- d) Inspect fan blades.
- e) Inspect belts.
- f) Inspect and replace grease in bearings.

Proactive measure to mitigate risk of sudden shut-downs.

3) COMS & CEMS

- a) RATA testing.

- 4) Ammonia Tank**
a) Change heaters.

Supplemental note to the preventive maintenance list:

Inspection for air leaks in the boiler systems includes inspecting:

1. All butt weld joints from the burner front to the stack.
2. All expansion joints.
3. All rotary valve seals for tightness.
4. All manways, handholes and inspection ports.
5. Packing attached to rotary valves and auger shafts.
6. All insulators and supports associated with electrodes and plates within the penthouse.

Please note that performing certain visual inspections to identify and seal air leaks can disrupt the normal air flow through the system. In such cases, there is a possibility that this PM work could create a temporary opacity exceedance. If this is the case, it will be classified as a system malfunction for permit compliance purposes.

Appendix C

Reporting Templates

(2) 40 CFR § 60.43c(d) states the PM and opacity standards under this section apply at all times, except during periods of startup, shutdown, or malfunction.

[illegible]

[illegible]

CERTIFICATE OF MAILING

I, Betty Williams, certify that I sent the Draft Administrative Consent Order, U.S. EPA

Order No. EPA-5-09-113(a)-05-OH, by Certified Mail, Return Receipt Requested, to:

Garrett Tinsman
Executive Vice President, Operations
Sauder Woodworking Company
502 Middle St.
Archbold, Ohio 43502

I also certify that I sent a copy of the Draft Administrative Consent Order, U.S. EPA

Order No. EPA-5-09-113(a)-05-OH, by First Class Mail to:

Robert Hodanbosi, Chief
Division of Air Pollution Control
Ohio Environmental Protection Agency
Lazarus Government Center
P.O. Box 1049
Columbus, Ohio 43216

Donald Waltermeyer, Air Pollution Control Supervisor
Ohio Environmental Protection Agency
Northwest District Office
347 North Dunbridge Road
Bowling Green, Ohio 43402

on the 24th day of August 2009.



Betty Williams, Administrative Program Assistant
AECAS(IL/IN)

CERTIFIED MAIL RECEIPT NUMBER: 70010320 0005 8915 8986